

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

Case No. 3:16-md-2738-MAS-RLS

MDL Case No. 2738

**DECLARATION OF STEPHEN D.
BRODY IN SUPPORT OF
DEFENDANT JOHNSON &
JOHNSON'S SECOND MOTION
TO REMOVE BEASLEY ALLEN
FROM THE PLAINTIFFS'
STEERING COMMITTEE**

I, Stephen D. Brody, hereby declare and state as follows:

1. I am over the age of eighteen, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to these facts if called to do so.

2. I represent Defendant Johnson & Johnson ("J&J") in the above-captioned litigation. I submit this declaration in support of J&J's Second Motion To Remove Beasley Allen From The Plaintiffs' Steering Committee.

3. Attached hereto as **Exhibit 1** is a true and correct signed copy of an declaration from Lynne M. Griebel dated September 9, 2024, and a true and correct signed copy of Ms. Griebel's June 28, 2024 Ballot for Talc Claims – Voting on

Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 1 has been redacted to protect personal identifying information.

4. Attached hereto as **Exhibit 2** is a true and correct signed copy of an declaration from Roberta Boyle dated September 6, 2024, and a true and correct signed copy of Ms. Boyle's July 4, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 2 has been partially redacted to protect personal identifying information.

5. Attached hereto as **Exhibit 3** is a true and correct signed copy of an declaration from Vidalia S. Enriquez dated September 4, 2024, and a true and correct signed copy of Ms. Enriquez's June 30, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 3 has been partially redacted to protect personal identifying information.

6. Attached hereto as **Exhibit 4** is a true and correct signed copy of an declaration from Connie Cazares dated September 5, 2024, and a true and correct signed copy of Ms. Cazares's June 24, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 4 has been partially redacted to protect personal identifying information.

7. Attached hereto as **Exhibit 5** is a true and correct signed copy of an declaration from Nancy Ann DiGenova dated September 9, 2024, and a true and correct signed copy of Ms. DiGenova's July 3, 2024 Ballot for Talc Claims – Voting

on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 5 has been partially redacted to protect personal identifying information.

8. Attached hereto as **Exhibit 6** is a true and correct signed copy of an declaration from Sherine F. Davis dated September 5, 2024, and a true and correct signed copy of Ms. Davis's July 10, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 6 has been partially redacted to protect personal identifying information.

9. Attached hereto as **Exhibit 7** is a true and correct signed copy of an declaration from Barbara Heinkel dated September 5, 2024, and a true and correct signed copy of Ms. Heinkel's June 25, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 7 has been partially redacted to protect personal identifying information.

10. Attached hereto as **Exhibit 8** is a true and correct signed copy of an declaration from Karen J. Donahue dated September 5, 2024, and a true and correct signed copy of Ms. Donahue's July 9, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 8 has been partially redacted to protect personal identifying information.

11. Attached hereto as **Exhibit 9** is a true and correct signed copy of an declaration from Yvonne Carole Eddy dated September 5, 2024, and a true and correct signed copy of Ms. Eddy's July 7, 2024 Ballot for Talc Claims – Voting on

Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 9 has been partially redacted to protect personal identifying information.

12. Attached hereto as **Exhibit 10** is a true and correct signed copy of an declaration from Jacqueline Byrd dated September 6, 2024, and a true and correct signed copy of Ms. Byrd's June 25, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 10 has been partially redacted to protect personal identifying information.

13. Attached hereto as **Exhibit 11** is a true and correct signed copy of an declaration from Jeanne Lizama dated September 5, 2024, and a true and correct signed copy of Ms. Lizama's June 28, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 11 has been partially redacted to protect personal identifying information.

14. Attached hereto as **Exhibit 12** is a true and correct signed copy of an declaration from Myesha Gary dated September 5, 2024, and a true and correct signed copy of Ms. Gary's June 24, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 12 has been partially redacted to protect personal identifying information.

15. Attached hereto as **Exhibit 13** is a true and correct signed copy of an declaration from Gloria Janice Douglas dated September 5, 2024, and a true and correct signed copy of Ms. Douglas's July 8, 2024 Ballot for Talc Claims – Voting

on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 13 has been partially redacted to protect personal identifying information.

16. Attached hereto as **Exhibit 14** is a true and correct signed copy of an declaration from Belle Kushner dated September 5, 2024, and a true and correct signed copy of Ms. Kushner's July 23, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 14 has been partially redacted to protect personal identifying information.

17. Attached hereto as **Exhibit 15** is a true and correct signed copy of an declaration from Julie Anna Belzman dated September 5, 2024, and a true and correct signed copy of Ms. Belzman's June 28, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 15 has been partially redacted to protect personal identifying information.

18. Attached hereto as **Exhibit 16** is a true and correct signed copy of an declaration from Lee Gromadzki dated September 7, 2024, and a true and correct signed copy of Ms. Gromadzki's June 25, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 16 has been partially redacted to protect personal identifying information.

19. Attached hereto as **Exhibit 17** is a true and correct signed copy of an declaration from Len James dated September 5, 2024, and a true and correct signed copy of Ms. James's June 23, 2024 Ballot for Talc Claims – Voting on Prepackaged

Chapter 11 Plan of Reorganization of the Debtor. Exhibit 17 has been partially redacted to protect personal identifying information.

20. Attached hereto as **Exhibit 18** is a true and correct signed copy of an declaration from Marilyn C. Collins dated September 4, 2024, and a true and correct signed copy of Ms. Collins's June 24, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 18 has been partially redacted to protect personal identifying information.

21. Attached hereto as **Exhibit 19** is a true and correct signed copy of an declaration from Miriam Knight dated September 5, 2024, and a true and correct signed copy of Ms. Knight's June 24, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 19 has been partially redacted to protect personal identifying information.

22. Attached hereto as **Exhibit 20** is a true and correct signed copy of an declaration from Tammy Brown dated September 6, 2024, and a true and correct signed copy of Ms. Brown's June 28, 2024 Ballot for Talc Claims – Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 20 has been partially redacted to protect personal identifying information.

23. Attached hereto as **Exhibit 21** is a true and correct signed copy of an declaration from Angela Greene dated September 4, 2024, and a true and correct signed copy of Ms. Greene's June 24, 2024 Ballot for Talc Claims – Voting on

Prepackaged Chapter 11 Plan of Reorganization of the Debtor. Exhibit 21 has been partially redacted to protect personal identifying information.

24. Attached hereto as **Exhibit 22** is a true and correct copy of the Master Ballot for Counsel to Holders of Channeled Talc Personal Injury Claims Voting on Prepackaged Chapter 11 Plan of Reorganization of the Debtor in *In re Red River Talc LLC*, electronically signed by Andy D. Birchfield of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., and dated July 26, 2024.

25. Attached hereto as **Exhibit 23** is a true and correct copy of a Master Ballot spreadsheet, submitted by Beasley Allen, containing the client ID, names, last four social security number digits, and dates of birth of each of the claimants purported to be represented by Beasley Allen, along with their (i) purported votes to accept or reject the prepackaged plan, (ii) basis for voting authority, and (iii) responses to the Disease Type Question, Diagnosis Question, Consistent Use Question, and First Use Question referenced on Page 5 of the Master Ballot annexed as Exhibit 22. Exhibit 23 has been partially redacted to protect personal identifying information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of September, 2024.



Stephen D. Brody
Counsel for Defendant Johnson & Johnson